

# **EXHIBIT “A”**

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

FOUR WOMEN HEALTH SERVICES, LLC,  
Plaintiff

CIVIL ACTION No: 1:24-CV-12283-JEK

vs.

ABUNDANT HOPE PREGNANCY  
RESOURCE CENTER INC., d/b/a  
ATTLEBORO WOMEN'S HEALTH  
CENTER, CATHERINE ROMAN, NICOLE  
CARGES, and DARLENE HOWARD,  
Defendants

**AFFIDAVIT OF DARLENE HOWARD**

1. My name is Darlene Howard. I am the executive director of Abundant Hope Pregnancy Resource Center, Inc. (Abundant Hope), a charitable corporation. I have held this position since 2015. As executive director, I oversee the day to day functioning of Abundant Hope and am aware of the activities of its employees and volunteers. At no time have I, or anyone on behalf of Abundant Hope, ever used technological means to intercept communications between Four Women Health Services, LLC, and its patients or prospective patients. Nor have I, or anyone on behalf of Abundant Hope, ever infiltrated, or attempted to infiltrate, Four Women's electronic platforms.

2. All the services, goods, and advice that Abundant Hope provides to its clients is free of charge. It does not engage in commercial activity.

3. Abundant Hope has 7 employees and relies on volunteer help. It would be impossible for it to produce, in a short time frame, "Documents sufficient to show all calls made and received by any AWHC Phone during the Relevant Time Period (January 1, 2023, to present),

such as call logs or similar phone records which include dates, times, phone numbers, names, and duration of the calls.” (Specific date added.) (Plaintiff’s Request for Production of Documents #2). In addition, I am concerned that production of such records would violate the privacy rights of Abundant Hope’s clients.

4. Similarly, it would be impossible for Abundant Hope to produce, in a short time frame, “All documents, including records, time sheets, or other employment documentation sufficient to show all AWHC Staff working at or near AWHC or remotely for AWHC on each day during the Relevant Time Period (January 1, 2023 to present).” (Specific date added.) (Plaintiff’s Request for Production of Documents #4). In addition, I am concerned that production of such records would violate the privacy rights of Abundant Hope’s staff.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

9/21/24  
Date

Darlene Howard  
Darlene Howard